

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

IN RE: FRAGRANCE DIRECT
PURCHASER ANTITRUST LITIGATION

Civil Action No. 23-2174

IN RE: FRAGRANCE INDIRECT
PURCHASER ANTITRUST LITIGATION

Civil Action No. 23-3249

IN RE: FRAGRANCE END-USER
PLAINTIFF ANTITRUST LITIGATION

Civil Action No. 23-16127

**JOINT STIPULATION
AND AMENDED
SCHEDULING ORDER**

Judge William J. Martini

WHEREAS the operative Scheduling Order in the above-captioned actions is set forth at No. 23-2174, ECF No. 193; No. 23-3249, ECF No. 146; and No. 23-16127, ECF No. 128;

WHEREAS the Court granted the United States' Motion to Intervene in the above-captioned actions for the purpose of seeking a limited stay of discovery;

WHEREAS the Parties in the above-captioned actions and the United States met and conferred regarding the scope of a limited stay of discovery;

WHEREAS the Parties and the United States stipulated to a limited stay of discovery until February 15, 2026 ("the Joint Stipulation to Stay");

WHEREAS the Scheduling Order contains certain deadlines relating to the filing of amended complaints and further briefing on any renewed motion to dismiss for lack of personal jurisdiction under Rule 12(b)(2);

WHEREAS agreement by the Plaintiffs to the Joint Stipulation to Stay is conditioned upon the deferral of the filing of any amended complaints and briefing on any renewed Rule 12(b)(2) motions until after expiration or termination of any stay of discovery; and

WHEREAS the Defendants agreed to defer the entry of an amended schedule for the filing of amended complaints and further jurisdictional briefing until a stay of discovery expires or is terminated;

NOW THEREFORE, PLAINTIFFS AND DEFENDANTS IN THE ABOVE-CAPTIONED CASES, BY AND THROUGH THEIR UNDERSIGNED COUNSEL, HEREBY STIPULATE AND AGREE AS FOLLOWS:

1. Neither Plaintiffs nor Defendants¹ will file any amended complaints or motions to dismiss under Rule 12(b)(2) (lack of personal jurisdiction) until after expiration or termination of any stay of discovery, unless so ordered by the Court.
2. Plaintiffs and Defendants jointly request that the Court order that all pending deadlines in the Scheduling Order (No. 23-2174, ECF No. 193; No. 23-3249,

¹ DSM-Firmenich, Firmenich International SA, Givaudan SA, and Symrise AG.

ECF No. 146; and No. 23-16127, ECF No. 128) be held in abeyance until such time as Plaintiffs and Defendants can meet and confer after expiration or termination of any stay of discovery to propose new deadlines in the form of a proposed Amended Scheduling Order.*

IT IS SO STIPULATED.

Date: August 18, 2025

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IT IS SO ORDERED

Dated: August 26, 2025

s/Jessica S. Allen
Hon. Jessica S. Allen, U.S.M.J.

*The parties shall confer and submit a proposed amended scheduling order on or before **March 2, 2026**. There shall be an **in-person** Case Management Conference on **March 10, 2026, at 11:00 a.m.**

SO ORDERED.

s/Jessica S. Allen
United States Magistrate Judge